

# **DRAFT**

STATE OF MAINE  
PUBLIC UTILITIES COMMISSION

Docket No. 99-851

MAINE PUBLIC UTILITIES COMMISSION  
Investigation into Bell Atlantic-Maine's  
Alternative Form of Regulation

STIPULATION

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Verizon Maine's Petition for Reconsideration filed July 16, 2001 in the above-referenced proceeding raised, among other things, several issues related to the operation of the Service Quality Index ("SQI") for the duration of the renewed AFOR plan. Subsequent to the filing of the Petition, and on notice to all affected parties, the Staff conducted a series of conferences among the parties to discuss the SQI issues raised in the Petition. Participating parties in these discussions, in addition to Verizon Maine, include the Public Advocate and the Telephone Association of Maine ("TAM"). Based on these discussions, the parties, with the concurrence and support of the Staff, wish to put before the Commission a stipulated resolution of the SQI issues raised by Verizon Maine in its Petition as follows:

## **Repair Appointments**

1. The Commission's Order proposed two separate service quality metrics to gauge Verizon Maine's performance at timely completing repairs. The Order requires that Verizon Maine measure its success at meeting its repair commitments for repairs involving a premises visit by Verizon personnel separately from what the Commission perceived as "mechanized" or "flow-through" repairs. Verizon explained in its Petition however, and in the ensuing discussions, that while not all repairs require a premises visit, there are no "mechanized" or automatic repairs, since all repairs generally require

the intervention of service technicians to the site of the trouble, which if not at the customer's premises may be in the central office, in Verizon's interoffice network, or somewhere in the outside plant.

2. To recognize this circumstance the parties propose to re-design the two SQI metrics to measure the timeliness of Verizon Maine's completed repair commitments where a premises visit is required, separately from completed repairs where a dispatch to a customer's premises is not required. From the repair "disposition codes" that Verizon Maine assigns to each completed repair, Verizon can identify the repairs that require a premises visit from those that do not. Verizon shall therefore report under two separate metrics: (1) the percentage of repairs not completed by the commitment date due to Company reasons that involve a premises visit ("Premises Repair Appointments Missed") and; (2) the percentage not completed by the commitment date due to Company reasons where no premises dispatch is required ("Non-Premises Repair Appointments Missed"). The performance benchmark in the SQI for each category will be established based upon the average service results for Verizon Maine for the three historic years ending June 30, 2001.

Customer Credit for Service Outage

3. By tariff, Verizon Maine presently offers subscribers whose service is interrupted a *pro rata* credit of their monthly charge for basic service for each consecutive twenty four hour period that a subscriber is out of service. If a customer has reported their service out to Verizon Repair, the credit is determined and applied to the bill automatically by Verizon if the subscriber is not restored to service within 24 hours. Alternatively, the tariff allows a customer to claim the credit by calling the Business

Office within ten days of an out of service condition to request a *pro rata* credit. The Commission's Order directed Verizon Maine to extend the *pro rata* credit to all subscribers who are out of service, whenever Verizon "knows" about a service interruption that meets the tariff conditions, regardless of whether the subscriber ever contacts the Repair Center or the Business Office.

4. The automatic credit envisioned by the Order would be a burdensome manual process for Verizon Maine to implement since it has no present mechanized process to match customer billing information (*e.g.*, billing telephone number, customer name, and customer address) automatically to specific network facilities that may be affected by a service outage. For example, when a distribution cable is cut or a digital loop carrier facility fails, Verizon affects repairs utilizing engineering records that do not contain customer service information. There is no mechanized process in Verizon that could feed information from the engineering records about the conduct of the repair (*i.e.*, which specific customers were affected by the outage and for how long) automatically to the Company's billing records to process a credit.

5. As an alternative, the parties propose to expand the availability of the current service credit mechanism through enhanced customer outreach and education.

Subscribers will be educated that in order to qualify for an out of service *pro rata* credit they must either contact the Verizon repair center to report an out of service condition on their line, or call the Business Office subsequent to the repair. In order to ensure that customers are fully aware of the availability and reporting requirements for credit, Verizon Maine proposes to advise its subscribers of the operation of the credit by the following means:

- a. Verizon Maine will revise the introductory pages of the white pages directory to describe the availability and qualifications for a billing credit for out of service conditions;
  - b. Verizon Maine will publish in an upcoming edition of its customer newsletter bill insert, Verizon Extra, an article that describes the operation of the *pro rata* credit;
  - c. Verizon will include in a subsequent "bill imprint" message a description of the *pro rata* credit; and
  - d. Verizon will annually, in each calendar year commencing in 2002, run a "bill imprint" message reinforcing the availability of the credit and provide a second customer notice each year, either by bill imprint or newsletter article, at Verizon Maine's option;
  - e. Verizon Maine will amend its tariff to extend the ten (10) day period currently afforded subscribers to contact the Business Office to request a credit to provide affected subscribers a total of thirty (30) days in which to request the credit.
6. If Verizon Maine fulfills all of the foregoing conditions, the Commission will not require that Verizon process the credit automatically for customers whenever it "knows" from non-customer sources about a specific service outage.

#### Call Blocking Performance

7. The Commission Order desired the development of a single SQI metric that could capture the peak period call completion performance of the public switched network in terms of measuring terminating call blocking from whatever network cause (*i.e.*, switch module links, line units, Host-Remote "umbilicals," and interoffice trunking.) Verizon Maine's Petition for Reconsideration noted several practical impediments to immediate implementation of such a metric.

8. First, Verizon noted that switch module links are not a separate congestion point within the network. In a Host central office, the links between switch modules are non-concentrating, meaning that there is no shared network capacity for calls within the Host switch and, therefore, no call blocking in the links on intra-switch calls. In a Remote central office the links between switch modules are designed to send overflow

calls within the Remote's switch modules over the "umbilicals" between the Remote and its Host as an alternate (or final) means of call completion. Accordingly, no calls are blocked among switch modules in a Remote office unless and until the "umbilicals" are blocking, and umbilical blocking between Host-Remote switches is itself a measured network metric.

9. Accordingly, the proposed criterion of measuring blocking on switch module links should be deleted from the proposed service metric. Such links in a Host office do not block, and the potential for blockage between modules in a Remote central office will be captured in the assessment of call blockage over the umbilicals.

10. Verizon Maine currently employs the Traffic Data Management System ("TDMS") to monitor hundreds of various components of Verizon's central office switches and associated switched network investment on a continuous basis. TDMS provides an informational report every thirty minutes, twenty four hours a day, on service conditions across hundreds of switches and switch periphery (line units and other line serving peripherals, umbilicals, and interoffice trunking). From this torrent of performance data Verizon is alerted to conditions requiring immediate remedial action (*e.g.*, a switch failure or trunk outage). Verizon Maine also extracts from TDMS the data necessary to develop various monthly summary reports monitoring conditions on the network over time, which engineers and technicians at Verizon employ to diagnose conditions over the major components of the network.

11. Because of the volume of data generated by TDMS, the active historic database in TDMS is retained by the system only for a rolling eight day period. Accordingly, Verizon develops and runs specific reporting programs on TDMS data in

order to capture and summarize relevant data for Verizon's internal operations purposes before such data is deleted automatically from the system. Certain reports summarize data for a network component on a "peak period" basis (*i.e.*, the specific time period each day over which usage of the component hits its actual peak), while other reports measure usage on a pre-determined "busy hour" (*i.e.*, that specific and constant hour over which a component's usage is expected to be the highest). Still other reports are prepared measuring usage over a continuous twenty four hour measurement period.

12. Accordingly, the Commission's expressed desire to establish in a single SQI metric an objective measure of terminating peak period call blocking across all network components (line units and other line serving peripherals, umbilicals, and trunks) cannot be presently accommodated with the reports Verizon presently assembles to manage the performance of individual network components. Differing components of the network "peak" at different times; some reports measure "peak usage," others capture "busy hour" usage (which may, or may not, be the "peak period" on any given day) and reports for other network components measure a full twenty four hours' performance. There is no current process to "roll up" the available reporting data for each network component into a single, meaningful and consistent peak period measure of the entire network.

13. Notwithstanding such present data reporting limitations, it should be possible technically for Verizon Maine to develop an integrated and consistent report extracting active data from TDMS, averaged over a month, that generally depicts in a single metric all blocking (line units and other line serving peripherals, umbilicals, and trunks) in a peak period, recognizing that the data for line units and peripherals will capture only terminating blocking, umbilical data will reflect both originating and terminating call

blocking, and trunk data will show blocking only from the originating office. Verizon Maine needs approximately thirty days in which to write such a reporting program, another thirty days in which to test the program, and then a subsequent thirty days to verify that the program is accurately reporting monthly averaged data as it was designed to do. Verizon Maine commits to proceed with the development of such a summary report that would reflect all causes of terminating call blocking on the network.

14. Because the contemplated report will be new, however, Verizon Maine has no historic data from which to fashion an appropriate "benchmark" for the metric. The new reporting program must be developed, tested, and formally established in order to retain the necessary underlying network usage data from TDMS that today is lost after eight days. Accordingly, once the program for the new, single metric report of all terminating blocking is successfully developed (hopefully before the end of 2001), the parties propose to collect historic results from Verizon Maine under the new metric for the ensuing twenty four months, or until May 31, 2004, whichever time period is longer. Beginning in the AFOR year commencing June 1, 2004, Verizon will utilize the new metric as the applicable call block performance metric in the SQI.

15. For all AFOR years prior to June, 2004, Verizon will employ as an SQI metric for terminating blocked calls a combined present metric that reflects network performance on all applicable network components, measured on a twenty four hours basis. Monthly averaged results on a historic basis for such a metric are available from existing reports which commenced in mid-1999. Accordingly, prospectively under the AFOR (and until June, 2004), Verizon can capture and report network performance based

on monthly averages of continuous twenty four hours results, which can be compared to the historic benchmark results for SQI enforcement purposes.

Conclusion

16. The parties further agree that acceptance of this Stipulation by the Commission is in the public interest as it resolves certain issues of the parties and the Staff regarding establishment of the SQI for the renewed AFOR. It is agreed and understood that the Stipulation is an integrated whole, with every provision integrally related to every other provision. As such, the parties agree that rejection or revision by the Commission of any separate provision of this Stipulation constitutes rejection of the entire agreement. Should the Commission fail to adopt the entire Stipulation as filed by the parties, the Stipulation shall be void and of no further effect. Under such circumstances, neither the Stipulation nor any part thereof shall be offered, introduced, or relied upon by the Commission as evidence in this or any other proceeding.

Respectfully submitted,

VERIZON MAINE

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Dated: September , 2001